

1 SCOTT N. SCHOOLS (SCBN 9990)
United States Attorney

2 MARK L. KROTKO (CASBN 138549)
3 Chief, Criminal Division

4 BRIGID S. MARTIN (CASBN 231705)
5 Special Assistant United States Attorney

6 450 Golden Gate Avenue, Box 36055
7 San Francisco, CA 94102
Telephone: (415) 436-7129
Facsimile: (415) 436-7234
Email: brigid.martin2@usdoj.gov

8 Attorneys for Plaintiff

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) No. CR 06-0410 WHA
14 Plaintiff,) STIPULATION and [Proposed] ORDER
15 v.) EXCLUDING TIME UNDER THE
16 KIM EDWARD CAMPBELL,) SPEEDY TRIAL ACT
17 Defendant.)
18

19 The United States and defendant KIM EDWARD CAMPBELL stipulate to exclusion of time
20 under the Speedy Trial Act from February 27, 2007, to March 13, 2007, as follows:

21 1. The parties appeared before the District Court on February 27, 2007, for a Status
22 Conference.

23 2. At this appearance, defendant KIM EDWARD CAMPBELL requested, the
24 government agreed, and the Court approved, an exclusion of time under the Speedy Trial Act, 18
25 U.S.C. § 3161(c)(1), from February 27, 2007, to March 13, 2007. The grounds for exclusion
26 were under 18 U.S.C. § 3161(h)(8)(A) & (B)(iv). Failure to grant the requested exclusion of
27 time would unreasonably deny defense counsel and government counsel reasonable time
28 necessary for effective preparation, taking into account the exercise of due diligence.

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1 Additionally, failure to grant the requested exclusion of time would unreasonably deny the
2 defendant continuity of counsel. Furthermore, the parties agree that the ends of justice served by
3 excluding the period from February 27, 2007, to March 13, 2007, outweigh the best interest of
4 the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

5 3. A proposed Order is submitted with this stipulation.

6

7 DATED: February 27, 2007 Respectfully submitted,

8 SCOTT N. SCHOOLS
United States Attorney

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10 /s/ Brigid S. Martin
11 BRIGID S. MARTIN
Special Assistant United States Attorney

12 /s/ Claire Leary
13 CLAIRE LEARY
COUNSEL FOR DEFENDANT KIM EDWARD CAMPBELL
Tel: 415.225.4640

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) No. CR 06-0410 WHA
Plaintiff,) [proposed] ORDER EXCLUDING TIME
v.) UNDER SPEEDY TRIAL ACT
KIM EDWARD CAMPBELL,)
Defendant.)

Based upon the Stipulation of KIM EDWARD CAMPBELL and the United States, and for good cause shown, IT IS HEREBY ORDERED that time under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), is excluded from February 27, 2007, to March 13, 2007, under 18 U.S.C. § 3161(h)(8)(A) & (B)(iv). The Court finds that the failure to grant this exclusion of time would unreasonably deny counsel for the defendant and the government the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Additionally, failure to grant the requested exclusion of time would unreasonably deny the defendant continuity of counsel. The Court further finds that the ends of justice served by such action outweigh the best interest of the public and the defendant in a speedy trial.

DATED: March 1, 2007



Hon. William H. Alsup
United States District Court Judge